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The Honorable Kevin J. Martin, Chairman
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

Re: Local Number Portability Porting Interval and Validation
Requirements
WC Docket No. 07-244; CC Docket No. 95-116

Dear Chairman Martin:

We are writing to express our support for prompt Commission action in the Local Number Portability ("LNP") docket to reduce the timeframe in which wireline carriers port out telephone numbers to new service providers. American consumers have waited far too long for the wireline industry to fix this problem on its own, and the time for Commission intervention is now.

The Commission has repeatedly stated that the goal of the porting requirements set forth in the Communications Act and its rules is to allow consumers to be able to change carriers while keeping their telephone number as easily as they may change carriers without taking their telephone numbers with them. When it comes to porting numbers from wireline carriers, that goal is not close to being met. The current wireline porting interval is 4 business days or almost a calendar week, and the record in this proceeding demonstrates that the actual porting period often is much longer. This standard has not changed since it was first set over a decade ago, despite the numerous dramatic improvements in information processing and other technologies that have made virtually every other aspect of the telecommunications business more efficient. The wireless industry, by contrast, has voluntarily established a 2 ½ hour number porting interval.

We strongly endorse the Commission's recent decision to limit the validation information that porting out carriers may demand as a significant first step in removing artificial impediments to an efficient LNP process. The Commission should now take the next step of shortening the wireline and intermodal porting interval to meet its long-held objective of allowing consumers to retain their numbers without impairment of quality, reliability,

or convenience, when they switch from one telecommunications provider to another.

We urge the Commission to take this action as expeditiously as possible, so that consumers will quickly reap the benefits of flexibility in the quality, price, and variety of telecommunications services.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Chris Murray".A handwritten signature in black ink, appearing to read "Gigi B. Sohn".

Chris Murray, Senior Counsel
Consumers Union

Gigi B. Sohn, President
Public Knowledge

cc: Honorable Michael J. Copps, Commissioner
Honorable Jonathan S. Adelstein, Commissioner
Honorable Deborah Taylor Tate, Commissioner
Honorable Robert M. McDowell, Commissioner